

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

X

ANDREW DELANCEY,

Case No.: 1:23-cv-10357(AT)

Plaintiff,

- against -

JUSTIN WELLS, FOX CORPORATION, and
FOX NEWS NETWORK, LLC.,

Defendants.

X

**DECLARATION OF ALFREDO PELICCI IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANTS MOTION FOR A PROTECTIVE ORDER**

I, Alfredo Pelicci, an attorney duly admitted to practice before the United States District Court for the Southern District of New York, hereby declare, under the penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner with the law firm of Filippatos PLLC and counsel for Plaintiff Andrew Delancey in the above matter. I am fully acquainted with the facts of this matter.
2. Attached hereto as **Exhibit A**, is a true and correct copy of the August 7, 2024, email from Alfredo Pelicci.
3. Attached hereto as **Exhibit B**, is a true and correct copy of the August 28, 2024, email from Krissy Katzenstein.
4. Attached hereto as **Exhibit C**, is a true and correct copy of the March 11, 2025, email from Krissy Katzenstein.
5. Attached hereto as **Exhibit D**, is a true and correct copy of the March 12, 2025, email from Sara Hoult.

6. Attached hereto as **Exhibit E**, is a true and correct copy of the Discovery Order in Delgado v. Trump for President, Inc. et al., No. 19-CV-11764 (AT) (KHP), 2024 WL 3219809 (S.D.N.Y. 2024).
7. I affirm under penalty of perjury that the foregoing is true and correct to the best of my knowledge and understanding.

Dated: March 14, 2025
New York, New York

FILIPPATOS PLLC

/s/ Alfredo Pelicci
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